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August 1, 2013

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Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication
GN Docket No. 12-268

Dear Ms. Dortch:

On Tuesday, July 30, 2013, the representatives of the Alaska Broadcasters Association named in the attached list met with Commissioner Ajit Pai and his Legal Advisor, Nicholas Degani, in Anchorage, Alaska, and discussed the contents of the attached letter provided to Commissioner Pai at the meeting. The letter and the discussion stressed the importance of protecting the hundreds of television translators and low power television stations that provide vital over-the-air television service to vast areas of rural Alaska.

Respectfully submitted,
Fletcher, Heald & Hildreth, PLC


Frank R. Jazzo
Counsel to Alaska Broadcasters Association

Enclosures

CC: Honorable Commissioner Ajit Pai (by e-mail)
Nicholas Degani, Esquire (by e-mail)

Commissioner Pai Attendees 7/30/2013 KTUU-TV

FCC Commissioner Ajit Pai

FCC Legal Aide for Commissioner Pai, Nick Degani

Andrea Gusty, Senator Murkowski Anchorage Office Staff

Peter Lewis, Senator Murkowski DC Office Communications

Jason Suslavich, Congressman Young DC Office Communications

Andrea Sanders, Senator Begich DC Communications

Andy MacLeod, GM KTUU-TV Schurz Communications

Darlene Simono, Executive Director ABA

Cathy Hiebert, Executive Assistant ABA

Matt Wilson GM, KSRM Radio Kenai, ABA President

Charlie Ellis GM, KATH-TV, ABA Vice President

Ric Schmidt GM, KNOM AM/FM, ABA Treasurer

Robert J. (Bob) Wyatt Chief Technology Officer Alaska Public Media

Steve Lindbeck, CEO and GM KAKM TV and KSKA-FM Alaska Public Media

Steve Hamlin, Technical Services Manager Alaska Public Broadcasting Inc

Jerry Bever Vice President/GM Alaska Broadcasting Company, Inc. KTVA-TV

Scott K. Smith GM – Sales Anchorage Media Group, ABA Board of Directors

Dennis Bookey, AK Market Manager, Chair SECC Anchorage Media Group

Carol Schatz, CEO KNBA-FM Koahnic Broadcast Corporation

Tom Oakes, VP Programming/Operations Ohana Media Group

Kirsten Bolton, Director of Sales Ohana Media Group

**Andy Tierney, GM KDMD-TV Anchorage, KTNL Sitka, KUBD Ketchikan
and KXLJ Juneau**



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July 30, 2013

BY HAND DELIVERY

Honorable Commissioner Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Communication, GN Docket No. 12-268

Dear Commissioner Pai:

The Alaska Broadcasters Association, representing radio and television broadcasters across Alaska, submits this letter to request that the Commission, as it develops its repacking plan, protect the spectrum used by hundreds of television translator stations to provide service to rural Alaska.

Much of Alaska receives its only over-the-air television service over television translators and low-power television ("LPTV") stations. The communities spread out over the Kenai Peninsula receive their service from a string of television translators licensed to Anchorage stations. Several network affiliates in Alaska's smaller markets also transmit over LPTV facilities. And, perhaps most significantly, the state-operated Alaska Rural Communications System ("ARCS") serves 200 or more communities in rural Alaska – communities with little other access to video services – through a network of television translator stations.

The FCC's database shows that there are 319 licensed and applied-for analog LPTV stations, and 76 licensed and applied-for digital LPTV stations in Alaska communities. The State of Alaska is in the process of replacing the ARCS analog television translators in rural areas with digital television translators, prior to the September 2015 date to eliminate analog LPTV service.

Alaska television broadcasters and the Alaska Broadcasters Association ask that the FCC consider Alaska's unique needs and protect these LPTV and television translator services. While the spectrum used by most Alaska LPTV and television translator stations – many of which operate on VHF channels – is unlikely to be valuable for wireless broadband service, there is a risk that a broadly written FCC decision to clear spectrum in the lower 48 states could have an adverse effect in Alaska with no corresponding benefit to anyone.

To the extent possible, Alaska Broadcasters also request that the Commission leave these stations on their present channels. Since the cost of moving LPTV and television translator stations is not reimbursable under the Spectrum Act, and few – if any – of these stations generate significant revenues, requiring them to obtain new equipment to change channels could similarly make it impossible for them to continue in operation, thus denying vital broadcast service to the public.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Wilson', with a long, sweeping horizontal line extending to the right.

Matt Wilson
President
Alaska Broadcasters Association

cc: GN Docket No. 12-268 (by ECFS)